

**PLATZER, SWERGOLD,  
GOLDBERG, KATZ & JASLOW, LLP**

*COUNSELORS AT LAW*

475 PARK AVENUE SOUTH  
18<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10016  
TELEPHONE 212.593.3000  
FACSIMILE 212.593.0353

WWW.PLATZERLAW.COM  
NY DCL # 1315219

FOUR GREENTREE CENTRE  
601 ROUTE 73 NORTH  
SUITE 305  
MARLTON, NEW JERSEY 08053  
TELEPHONE 856.782.8644

☐ *If checked, reply to  
New Jersey Office*

April 6, 2022

**VIA ECF**

Honorable Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *JKAYC, LLC v. Noah Bank*, 1:20-cv-00943-PKC-RLM

Dear Judge Mann:

We are attorneys for plaintiff, JKAYC, LLC (“Plaintiff”), and write with the consent and approval of counsel for defendant, Noah Bank (“Defendant”), to: (a) comply with Your Honor’s “Order re #44” which, *inter alia*, required counsel for the parties to inform the Court by April 6, 2022 as to their preference for either a settlement conference with Your Honor or referral to court-annexed mediation, and (b) to request that the parties discovery schedule be modified by extending the current deadlines by, approximately, an additional thirty days.

The extended discovery deadlines are necessary because Plaintiff’s corporate representatives require the services of a Korean-to-English translator for their depositions. The parties agree that the current discovery schedule makes the logistics for conducting these depositions impractical. Moreover, the parties have scheduled four (4) depositions to date and believe that the additional time will allow party and third-party depositions to be completed on schedule, barring any unforeseen circumstances.

**PLATZER, SWERGOLD,  
GOLDBERG, KATZ & JASLOW, LLP**

*COUNSELORS AT LAW*

Hon. Roanne L. Mann

April 6, 2022

Page -2-

The parties propose that the schedule be modified as follows: fact discovery, including depositions, to be completed by May 27, 2022. Expert reports to be served by July 29, 2022, and rebuttal expert reports to be served by August 26, 2022. While the parties did not state explicitly that there would be a time period for expert depositions, the parties contemplated the possibility of conducting such depositions and propose that they be completed by September 23, 2022.

To accommodate this modified schedule, counsel for the parties have conferred and chosen to request that Your Honor schedule a settlement conference at a date convenient for the Court and the parties between June 21 and June 30, 2022, or as soon thereafter as is practicable

Respectfully Submitted,

**PLATZER, SWERGOLD,  
GOLDBERG, KATZ & JASLOW, LLP**

By: /s/ Richard A. Lafont

Richard A. Lafont

rlafont@platzerlaw.com

cc: Kelly A. Zampino, Esq. (via ECF)